

THE LAW OFFICE OF GREGORY JAVARDIAN, LLC
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:
Robert Pierantoni, Jr. a/k/a Robert
Pierantoni

Debtor(s)

Ditech Financial LLC f/k/a Green Tree
Servicing LLC

Movant

v.

Robert Pierantoni, Jr. a/k/a Robert
Pierantoni

and

Robert P. Sheils, Jr., Esquire
Respondent

Chapter 7 Proceeding

5-16-00757 JJT

**STIPULATION BY AND BETWEEN ROBERT P. SHEILS, JR., ESQUIRE, TRUSTEE,
AND DITECH FINANCIAL LLC F/K/A GREEN TREE SERVICING LLC**

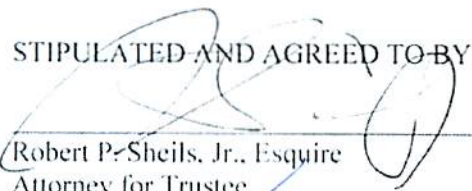
WHEREAS, the parties hereto, and their respective counsel, have agreed as to the disposition of the Motion for Relief from the Automatic Stay filed by Mary F. Kennedy, Esquire on behalf of mortgagee, Ditech Financial LLC f/k/a Green Tree Servicing LLC ("Movant").

NOW, THEREFORE, intending to be legally bound, the parties hereto, herewith stipulate as follows:

- 1. Movant is a mortgagee and holder of a perfected, secured claim against the Debtor pursuant to a Note and Mortgage on Debtor's real estate known as at 159-16 84th Road, Jamaica, NY 11432-1630.**
- 2. Upon approval by the United States Bankruptcy Court of the within Stipulation, Trustee, Robert P. Sheils, Jr., Esquire, and secured creditor, Ditech Financial LLC f/k/a Green Tree Servicing LLC, agree to the following:**
 - (a) Based on the value of the property and the amount due Movant, the Trustee intends to try to sell the property.**
 - (b) The Trustee agrees that the property shall be sold and Movant's mortgage lien paid in full on or before September 30, 2017.**
 - (c) If any of the provisions in paragraph 2 (b) above are not completed by the date set forth therein the parties agree that Movant may certify the default to this Court and an Order shall be entered granting Ditech Financial LLC f/k/a Green Tree Servicing LLC and/or its successors and assigns relief from the automatic stay without further notice and hearing.**
 - (d) Should Ditech Financial LLC f/k/a Green Tree Servicing LLC and/or its successors and assigns be granted relief from the stay after filing a Certification of Default in accordance with paragraph 2(c) above, the parties agree that the said relief order shall include the following language:**
"bankruptcy Rule 4001(a)(3) is not applicable and Movant is allowed to immediately proceed with foreclosure and all other relief available under the Non Bankruptcy law."

(e) The parties agree that a facsimile may be submitted to the Court as if it were
an original.

STIPULATED AND AGREED TO BY:


Robert P. Sheils, Jr., Esquire
Attorney for Trustee

Date: _____


Mary F. Kennedy, Esquire
Attorney for Ditech Financial LLC f/k/a Green Tree Servicing LLC

Date: 9/15/2016